l				
1	DAVID L. ANDERSON (CABN 149604) United States Attorney			
2 3	HALLIE HOFFMAN (CABN 210020) Chief, Criminal Division			
4	MICHELLE J. KANE (CABN 210579) KATHERINE L. WAWRZYNIAK (CABN 2527)	51)		
5	Assistant United States Attorneys			
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9 10	Attorneys for the United States			
11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN FRANCISCO DIVISION			
14				
15	UNITED STATES OF AMERICA,)	NO. CR 16-00440 WHA		
16	Plaintiff,)	STIPULATION AND [PROPOSED] ORDER FOR UNSEALING UNITED STATES' MOTION IN		
17	v.)	LIMINE NUMBER ONE AND ASSOCIATED DOCKET ENTRIES		
18	YEVGENIY ALEXANDROVICH NIKULIN,)			
19	Defendant.)			
20)			
21	The United States, represented by Assistant United States Attorneys Michelle J. Kane and			
22	Katherine L. Wawrzyniak, and defendant Yevgeniy Nikulin, represented by appointed counsel Adam			
23	Gasner and Valery Nechay, hereby stipulate that this Court may unseal United States' motion in limine			
24	number one, the defendant's response, and the Court's order, as well as the sealing orders associated			
25	//			
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	STIP. & [PROPOSED] ORDER 16-00440 WHA			

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1	with those pleadings (docket entries 140, 141, 159, 160, and 165). The parties agree that the grounds for		
2	filing the documents under seal no longer exist.		
3	DATED: Respectfully submitted,		
4	DAVID L. ANDERSON		
5	United States Attorney		
6			
7	MICHELLE J. KANE		
8	KATHERINE L. WAWRZYNIAK Assistant United States Attorneys		
9			
10	ADAM GASNER		
11	Counsel for Yevgeniy Alexandrovich Nikulin		
12			
13	VALERY NECHAY		
14	Counsel for Yevgeniy Alexandrovich Nikulin		
15			
16	ORDER		
17	Based on the stipulation of the parties, and good cause appearing therefor, the Court HEREBY		
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19			
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21	DATED:		
22	HON. WILLIAM ALSUP United States District Judge		
23	Officed States District Judge		
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20 27			
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